Executive Summary

As the Superfund program entered its fourteenth year in December 1993, the U.S. Environmental Protection Agency (EPA or "the Agency") continued to fulfill the requirements of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA) for protecting public health, welfare, and the environment. CERCLA requires that EPA update Congress each year on progress in the Superfund program. This Report fulfills the requirement.

EPA is committed to accelerating the pace of hazardous waste site cleanup. As part of this commitment, the Agency completed construction activities to place 61 National Priorities List (NPL) sites in the construction completion category during fiscal year 1994 (FY94). By the end of the fiscal year, work had occurred at more than 94 percent of the 1,355 sites proposed to, listed on, or deleted from the NPL, including a total of 278 sites (21 percent) that have achieved construction completion. Leaving a total of 1,226 sites currently listed on the NPL for fiscal year 1994. Reflecting the Agency's increasing emphasis on completing site cleanups, more than 78 percent of the construction completions have been achieved in the past three years.

The Agency also continued its successful efforts to encourage potentially responsible parties (PRPs) to undertake and finance clean-up efforts at Superfund sites. PRPs were leading more than 75 percent of remedial designs (RDs) and remedial actions (RAs) started during the fiscal year. Since the inception of the Superfund program, EPA has reached agreements worth more than \$10.0 billion for PRP response work at Superfund sites, including \$1.4 billion

achieved this year.

This Report summarizes Superfund FY94 progress, highlighting accomplishments and initiatives to improve the program. Exhibit ES-1 presents a summary of FY94 accomplishments. Exhibit ES-2 provides a comparison of FY94 accomplishments with those of previous years and presents cumulative program accomplishments. FY94 accomplishments reflect the Agency's commitment to, and focus of resources on, activities required to complete site cleanups.

Fiscal Year 1994 Initiatives

In FY94, the Agency focused efforts on identifying possible legislative amendments that would improve the efficiency and equity of the program. The Agency solicited input from advisory committees, stakeholders, and Agency and interagency workgroups to draft the proposed Superfund Reform Act of 1994. The proposed legislation focused on enhancing community involvement, expanding the role of states, reforming the remedy selection process, pursuing liability reforms to reduce transaction costs and increase fairness, and creating a fund, titled the Environmental Insurance Resolution Fund, to resolve coverage disputes between PRPs and their insurers. The Superfund Reform Act of 1994 completed extensive hearings and mark-ups, but did not come up for a final vote on the House or Senate floor.

Working within the existing statutory and regulatory framework, the Agency also continued to implement the recommendations of the 1993 Superfund Administrative Improvements Task Force. The task force recommendations included implementation of nine new or enhanced initiatives

Exhibit ES-1 Summary of Fiscal Year 1994 Superfund Activities

Remedial Activities						
Remediai Activities						
Percentage of National Priorities List Sites Where Work Has Begun		94%				
Sites Classified as Construction Completions as of September 30, 1994		278				
Sites with Remedial Activities in Progress on September 30, 1994		867				
Records of Decision Signed ¹		99				
Remedial Investigation/Feasibility Starts ²		70				
Fund-Financed		60%				
Potentially Responsible Party-Financed		40%				
Remedial Investigation/Feasibility Studies in Progress on September 30, 1994		873				
Remedial Design Starts ² Fund-Financed		110				
Potentially Responsible Party-Financed		25% 75%				
Remedial Designs in Progress on September 30, 1994		447				
Remedial Action Starts ²		120				
Fund-Financed		20%				
Potentially Responsible Party-Financed		80%				
Remedial Actions in Progress on September 30, 1994		447				
Removal Activities						
Removal Action Starts ²		310				
Fund-Financed		70%				
Potentially Responsible Party-Financed		30%				
Removal Action Completions ²		240				
Fund-Financed		80%				
Potentially Responsible Party-Financed		20%				
Site Assessment Activities						
CERCLIS Sites Added ²		1,100				
Preliminary Assessments Conducted ²		900				
Site Inspections Conducted ²		600				
National Priorities List Site Activities to Date		1,355				
Sites Proposed for Listing During Fiscal Year 1994		36				
Sites Listed During Fiscal Year 1994		43 10				
Sites Proposed for Deletion During Fiscal Year 1994	13					
Sites Deleted During Fiscal Year 1994		13				
Enforcement Activities						
Settlements for All Potentially Responsible Party Response Activities	230	(\$1.4 billion) ³				
Remedial Design/Remedial Action Settlements ⁴	88	(\$960 million)				
Unilateral Administrative Orders Issued (All Actions)	110	N/A				
Cost Recovery Dollars Collected	N/A	(\$200 million)				
		,				
Accomplishments at Federal Facility Sites						
Records of Decision Signed		60				
Remedial Investigation/Feasibility Study Starts ²		60				
Remedial Design Starts ² Remedial Action Starts ²		50				
		40				
 Records of decision signed for Fund-financed and potentially responsible party-financed sites. Numerical values for accomplishments based on information from CERCLIS have been rounded. Estimated value of work potentially responsible parties have agreed to undertake. Remedial design/remedial action settlements include remedial design/remedial action consent decrewith which potentially responsible parties have stated their intention to comply. 	ees and unilateral	administrative orders				

Sources: CERCLIS; Office of Waste Programs Enforcement; Office of Emergency and Remedial Response; Federal Register notices through September 30, 1994.

Exhibit ES-2
Summary of Program Activity by Fiscal Year

	FY80-86 Total	FY87	FY88	FY89	FY90	FY91	FY92	FY93	FY94	Total
Removal Completions ^{1,2}	810	230	320	260	290	270	340		240	3,050
CERCLIS Sites ¹	25,200	27,600	30,000	31,900	33,600	34,200	36,400	37,500	1,100	38,600
PA Completions ¹	20,200	4,000	2,900	2,200	1,600	1,300	1,900	1,100	900	36,100
SI Completions ¹	6,400	1,300	1,200	1,700	1,900	1,900	1,300	700	600	17,000
National Priorities List Sites ³	901	964	1,194	1,254	1,236	1,245	1,275	1,320	1,355	1,355
Remedial Investigation/ Feasibility Study Starts ^{1,2}	660	210	170	170	170	70	90 ⁷	60	70	1,670
Records of Decision Signed ²	199	77	152	136	149	175	126	134	99	1,247
Remedial Design Starts ^{1,2}	120	110	120	180	130	160	170 ⁸	130	110	1,230
Remedial Action Starts ^{1,2}	70	70	70	110	80	100	110 ⁹	120	120	850
Construction Completions ⁴						61	88	68	61	278
National Priorities List Deletions ⁵	13	0	4	11	1	9	2	11	13	64

¹ Numerical values for accomplishments based on information from CERCLIS have been rounded.

Sources: CERCLIS; Office of Emergency and Remedial Response; Federal Register notices through September 30, 1994.

² Includes Fund-financed and potentially responsible party-financed activities; excludes federal facility activities and state-lead activities where no Fund monies were spent.

³ The figures reported in this row represent the cumulative total of proposed, final, and deleted National Priorities List sites as of the end of each fiscal year.

Adopted as measure of program progress by 1991 30-Day Study Task Force. FY91 value represents FY80 through FY91.

⁵ FY93 deletions include 11 sites deleted because CERCLA clean-up objectives were met and one site deferred to another authority for clean-up.

⁶ The number for Removal Completions in FY92 was 342; it has been rounded for inclusion in the FY94 table so that figures will add properly. See also note 3.

⁷ The number for Remedial Investigation/Feasibility Starts in FY92 was 88; it has been rounded for inclusion in the FY94 table so that figures will add properly. See also note 3.

⁸ The number for Remedial Design Starts in FY92 was 172; it has been rounded for inclusion in the FY94 table so that figures will add properly. See also note 3.

⁹ The number for Remedial Action Starts in FY92 was 111; it has been rounded for inclusion in the FY94 table so that figures will add properly. See also note 3.

and the continuation of eight ongoing initiatives. The nine new initiatives center around five themes:

- Improving Clean-up Effectiveness and Consistency: EPA worked to streamline and expedite clean-up effectiveness and consistency by developing presumptive, or standard, remedies; standardizing non-site specific components of RDs; developing strategies for addressing the technical complexities associated with dense non-aqueous phase liquid (DNAPL) and lead contamination; and developing standardized soil screening levels (SSLs) to facilitate soil study and cleanup.
- Enhancing Community Involvement: EPA worked to promote earlier and increased community involvement in Superfund clean-up activities and decision-making. To this end, EPA facilitated public access to site information and site decision-makers, improved outreach materials, and used innovative techniques to involve and inform communities.
- Expanding the Role of the States: EPA worked to expand state involvement in Superfund cleanups to use limited resources more effectively and help accelerate the pace of cleanup. EPA has historically provided funding and technical assistance to support the development of state Superfund programs, and many states are cleaning up non-NPL-caliber sites under their own laws. During FY94, EPA developed draft deferral guidance for states, or other qualified governing bodies, for meeting criteria to conduct oversight of cleanups at NPL-caliber sites. Piloting the concept in seven states, EPA deferred 22 NPL-caliber sites to the states for oversight of the cleanup.
- Increasing Enforcement Fairness and Reducing Transaction Costs: EPA worked to reduce transaction costs and ensure equity in enforcement by promoting greater use of allocation tools, fostering more settlements with small-volume (*de minimis* and "de micromis") waste contributors, increasing fairness for owners of Superfund sites, and evaluating the use of mixed funding policy. As a result of the Agency's

- emphasis on earlier and increased use of *de minimis* settlements, for example, the Agency has reached 86 *de minimis* settlements in the last two years. While enhancing fairness to all involved PRPs by reducing transaction costs, the Agency also resolved the liability of more than 5,500 *de minimis* PRPs in these 86 settlements.
- Ensuring Environmental Justice: EPA worked to ensure that risks posed to low-income and minority populations in communities are adequately addressed by EPA's waste programs, including the Superfund program. Specifically, the Agency began implementing strategies to identify communities with potential environmental justice concerns and engaged in efforts to conduct outreach and address environmental hazards in these communities.

The eight ongoing initiatives included implementing the Superfund Accelerated Clean-Up Model (SACM), achieving construction completion at sites, strengthening contracts management, promoting enforcement first, accelerating cleanup at military bases slated for closure, promoting the development and use of innovative technologies, enhancing compliance monitoring, and improving the effectiveness of cost recovery. The Agency set and achieved a goal to implement most of the task force's recommendations by the end of FY94.

Site Evaluation Progress

EPA continued its progress in identifying and assessing newly discovered sites. At the end of FY94, there were more than 38,600 sites identified in the CERCLA Information System, the Superfund inventory of potentially hazardous waste sites. EPA had evaluated more than 94 percent of these sites for potential threats. The assessment activities included approximately 36,100 preliminary assessments and 17,000 site inspections. Based on these evaluations, EPA has determined that 1,355 of the sites should be proposed to, listed on, or deleted from the NPL. For a total of 1,226 remaining on the NPL for FY94. These sites include 46 proposed to, 43 listed on, and 13 deleted from the NPL during FY94. To date, a total of 64 sites have been deleted from the NPL.

To enhance site evaluation efforts, the Agency proceeded with ongoing efforts to address technical complexities associated with lead and radionuclide contamination, which could pose special hazards and problems. To address lead contamination, EPA continued to validate the Integrated Exposure Uptake Biokinetic Model and develop guidance for determining acceptable levels of lead in soil. The Agency also analyzed results from a three-city study on the affects of lead contamination in the blood-lead level of children exposed to the contaminant. To address sites with radioactive contamination, EPA continued to develop guidance, examined environmental fate and transport modeling, conducted clean-up technology demonstrations and evaluations, and provided technical support to the Regions.

Removal Progress

To protect human health and the environment from immediate or near-term threats, the Agency and PRPs started nearly 310 removal actions and completed 240 during FY94. More than 3,660 removal actions have been started and nearly 3,050 have been completed since the inception of the Superfund program.

Through SACM, the Agency continued its efforts to expand the use of removal authority for early actions to reduce risks more rapidly and expedite cleanup at NPL sites. Early actions may include emergency, time-critical, or non-time-critical removal responses or quick remedial responses. To support the use of early actions in FY94, EPA distributed setaside funds to conduct nine early actions in six Regions.

The Environmental Response Team (ERT) continued to provide expert support for Superfund response actions. During the fiscal year, ERT conducted 103 removal actions and 79 RAs, responded to 10 oil spills and 2 international incidents, and conducted 203 training courses nationwide. Response to international incidents are not paid for using Superfund dollars.

Under the reportable quantities (RQ) regulatory program, the Agency promulgated final RQ adjustments for 62 hazardous substances and added 5 to the list. Also, the Agency continued to work on

regulations to establish administrative reporting exemptions for naturally occurring radionuclide releases.

In other efforts, the Agency continued to develop the remaining volumes of the Superfund Removal Procedures Manual.

Remedial Progress

Remedial progress during the fiscal year reflects the Agency's continuing efforts to accelerate the pace of clean-up activities and complete cleanups at Superfund sites. At the end of FY94, work had occurred at 94 percent of the 1,355 sites proposed to, listed on, or deleted from the NPL, and construction activities had been completed to place 278 NPL sites (21 percent) in the construction completion category. During the year, the Agency and PRPs started nearly 70 remedial investigation/feasibility studies (RI/FSs), 110 RDs, and 120 RAs. EPA also signed 99 records of decision (RODs) for Fund-financed and PRP-financed sites. At the end of the year, 873 RI/FSs, 447 RDs, and 447 RAs were in progress at 867 sites.

As recommended by the 1993 Superfund Administrative Improvements Task Force, EPA continued several efforts to streamline remedial activities and increase the consistency and efficiency in Superfund cleanups. The Agency

- Demonstrated presumptive remedies developed for municipal landfills and sites contaminated with volatile organic compounds, while working to develop presumptive remedies for woodtreater, polychlorinated biphenyl, manufacturedgas-plant, grain storage, and polluted groundwater sites;
- Released draft soil screening levels (SSLs) for 100 chemicals commonly found at Superfund sites;
- Implemented guidance for addressing DNAPL contamination of ground water and for invoking the technical impracticability waiver where performance standards cannot be achieved.

In efforts to encourage the development and use of innovative treatment technologies to cleanup Superfund sites, the Agency took measures to demonstrate the technologies and provide information about them to potential users. To this end, EPA continued the Superfund Innovative Technology Evaluation Program, sponsored seven technical support centers and the Superfund Technical Assistance Response Team, and provided access to information and training. Working together with other federal agencies, academics, and the private sector, EPA conducted technology transfer efforts that included conferences and forums, demonstration and evaluation of innovative technologies, preparation of reference materials, and development of training and continuing education opportunities.

Enforcement Progress

Enforcement progress for FY94 reflects the Agency's continued commitment to maximize PRP involvement in financing and conducting cleanup, and to recover Superfund monies expended for response actions. During FY94, EPA reached agreements with PRPs worth more than \$1.4 billion in PRP response work. Through its FY94 cost recovery efforts, EPA achieved \$206 million in settlements and collected more than \$200 million for reimbursement of Superfund expenditures. Examples of significant enforcement actions are provided in Chapter 5 of this Report.

While continuing to promote "enforcement first" to secure PRP involvement in financing and conducting cleanups, the Agency also worked to ensure equity in the enforcement process and to seek ways to reduce transaction costs. To support these goals during FY94, the Agency focused on increasing the use of allocation tools such as alternative dispute resolution, encouraging early settlements with de minimis and "de micromis" parties, fostering greater fairness for owners and prospective purchasers of Superfund sites, and evaluating the increased use of mixed funding. The Agency also took steps to increase the effectiveness of compliance monitoring, improve cost recovery efforts, and expedite enforcement activities to support accelerated cleanups under SACM.

Federal Facility Cleanups

Federal departments and agencies are largely responsible for implementing CERCLA at federal

facility sites. To ensure federal facility compliance with CERCLA requirements, EPA provides advice and assistance, oversees activities, and takes enforcement action where appropriate. At sites on the NPL, EPA must concur in remedy selection.

At the end of FY94, there were 1,945 federal facility sites identified on the Federal Agency Hazardous Waste Compliance Docket. Of the sites on the docket, 160 were proposed to or listed on the NPL, including 150 final and 10 proposed sites. During FY94, 10 sites were proposed to and 24 were listed on the NPL.

With the interagency agreements executed during the year, a total of 121 of the 150 federal facility sites had enforceable agreements for cleanup in place. Activity during the fiscal year at federal facility sites listed on the NPL, included starting approximately 60 RI/FSs, 50 RDs, and 40 RAs; signing 60 RODs; and achieving construction completion at 17 sites.

In FY94, the Agency, in conjunction with the Department of Defense (DOD), states, and local citizens, implemented the Fast Track Clean-Up Program to expedite cleanup and reuse of bases scheduled for closure under the Base Realignment and Closure (BRAC) Act. BRAC was enacted to promote economic recovery of communities near closing bases. EPA, DOD, and the states established BRAC clean-up teams (BCTs) at 75 bases in FY94.

Also during the fiscal year, EPA, DOD, and the Department of Energy (DOE) published guidance identifying SACM components that provide opportunities for speeding cleanup. In addition to the BCTs, EPA participated in several interagency forums to support federal facility cleanups; these included the Federal Facilities Environmental Restoration Dialogue Committee, the Federal Facility Policy Group, the Defense Environmental Restoration Task Force, and DOE's Environmental Management Advisory Board. Through the Federal Facilities Forum, Multisite Technology Confirmation Initiative, public-private partnerships, and the Develop On-Site Innovative Technologies Committee, EPA coordinated efforts to establish federal facilities as testing and development centers for innovative technologies.

CERCLA Section 120(3)(5) requires an annual

report to Congress from each federal department or agency on its progress in implementing Superfund at its facilities. EPA's progress at its sites is provided in Section 6.4 of this Report. Of the sites on the Federal Agency Hazardous Waste Compliance Docket at the end of FY94, 20 were EPA-owned.

Superfund Program Support Activities

EPA took measures in FY94 to enhance community involvement, public access to Superfund information, and EPA's partnership with states and Indian tribes. As required by CERCLA Section 105(f), the Agency also engaged in efforts to encourage minority firm participation in Superfund contracting.

In its community involvement efforts, EPA continued measures to tailor activities to the specific needs of individual communities and to identify ways to enhance community involvement efforts. The Agency emphasized the importance of effective community involvement in its administrative improvements and reauthorization efforts. The Agency also continued to provide technical outreach to communities, hold national conferences on community involvement, offer training and workshops, and facilitate community access to technical assistance grants (TAGs). To aid communities in obtaining technical assistance, EPA awarded 16 TAGs during the fiscal year, bringing the total number of TAGs awarded since FY88 to 151, for a total worth of more than \$8.6 million.

To enhance public access to Superfund information, the Agency continued its partnership with the National Technical Information Service (NTIS), which provides Superfund document distribution services. During FY94, the Agency expanded the Superfund document collection available through NTIS, continued outreach to inform the public of the services available, and began implementing a communications and outreach plan using NTIS services.

To support state and tribal involvement in the Superfund response activities, EPA has awarded

nearly \$1.3 billion in cooperative agreements (CAs), including \$79 million awarded in FY94 through sitespecific CAs. With Trust Fund resources provided by EPA under these response agreements, states and Indian tribes were leading more than 75 RI/FSs, RDs, and RAs and enforcing more than 110 PRP responses at Superfund sites during the year. Continuing to assist states and tribes in developing comprehensive Superfund programs, EPA also granted Core Program CAs (CPCAs) worth nearly \$16 million during the year, for a total of \$103 million awarded to states and tribes in CPCA funding. To further support state and tribal Superfund programs, EPA engaged in outreach activities, provided technical assistance, and began developing guidance for a state deferral program for NPLcaliber sites.

To promote small and disadvantaged business participation in Superfund contracting in FY94, EPA, through direct and indirect procurement, awarded contracts and subcontracts valued at more than \$32.2 million to minority contractors to perform Superfund work. Direct procurement involves any procurement activity in which EPA is a direct party to a contractual arrangement for supplies, services or construction. Under financial assistance programs (indirect procurement), EPA awards grants and/or cooperative agreements to States, local municipalities, universities, colleges, non-profit or profit-making institutions or firms, hospitals and individuals or otherwise known as recipients. This amount represents more than 4.3 percent of the total dollars obligated to finance Superfund work during the year. To help minority contractors become more successful in winning Superfund contracts and encourage them to participate in the Superfund program, EPA conducted training sessions, conferences, and seminars throughout the year.

Resource Estimate for Superfund Implementation

Under section 301(h)(1)(c) of CERCLA, EPA is required to estimate the resources needed to implement Superfund, and CERCLA requires that EPA provide the estimates in this Report. Since the enactment of CERCLA in 1980, Congress has

provided Superfund with \$13.6 billion in budget authority (FY81 through FY94). This includes \$1.7 billion for the pre-SARA period (FY81 through FY86) and \$11.9 billion for the post-SARA period, FY87 through FY94.

Estimates of the long-term resources required to implement Superfund are based on the Outyear Liability Model (OLM). The OLM estimate of the cost of completing cleanup of current NPL sites is more than \$17.4 billion for FY95 and beyond,

bringing the total estimated cost for the program to \$31.0 billion.

Organization of this Report

Information prepared for this Report is assembled in response to Congressional requirements specified in CERCLA. Exhibit ES-3 is a guide to the information required under CERCLA and its location in the Report.

Exhibit ES-3
Statutory Requirements for the Report

CERCLA Section	CERCLA Requirement	Report Section	Report Content
301(h)(1)	Annual report to Congress on the progress achieved in	Chapter 1	Initiatives to improve the Superfund program
	implementing Superfund during the preceding fiscal year	Chapter 2	Site evaluation progress
		Chapter 3	Removal progress
		Chapter 4	Remedial progress
		Chapter 5	Enforcement progress
		Chapter 6	Federal facility cleanups
		Chapter 7	Community relations, state and Indian tribe, and public outreach activities
301(h)(1)(A)	Detailed description of each feasibility study (FS) at a facility	Section 4.4	Overview discussion of RODs signed during the fiscal year, including the number of treatment and containment remedies selected. [ROD summarizes and builds on the FS]
		Appendix C	List of RODs signed in the fiscal year
		ROD Annual Report	Abstracts of each ROD signed in the fiscal year
301(h)(1)(B)	Status and estimated date of completion of each FS	Appendix A	Status and estimated completion date of each ongoing FS in progress at the end of the fiscal year
301(h)(1)(C)	Notice of each FS which will not meet a previously published schedule for completion and the new estimated date for completion	Appendix A	Scheduled completion date published for the last fiscal year, the scheduled completion date recorded in CERCLIS as of end of the current fiscal year, and identification of schedule changes
301(h)(1)(D)	An evaluation of newly developed feasible and achievable permanent treatment technologies	Section 4.5	Evaluation of newly developed technologies through the Superfund Innovative Treatment Evaluation program
301(h)(1)(E) 121(c)	Progress made in reducing the number of facilities subject to review under CERCLA Section 121(c), which requires a report to the Congress a list of facilities for which a five-year review is required, the results of all such reviews, and any actions taken as a result of such reviews	Section 4.6	Annual update on progress being made on sites subject to review under CERCLA Section 121(c)

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Exhibit ES-3 (cont'd) Statutory Requirements for the Report

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CERCLA Section	CERCLA Requirement	Report Section	Report Content			
301(h)(1)(F)	remedial and enforcement actions undertaken during the fiscal year, including a comparison to remedial and enforcement actions undertaken in prior fiscal years	Executive Summary Section 4.2	Information on fiscal year remedial activity starts (including PRP involvement) with a comparison of fiscal year activities to those of previous years			
		Section 5.2	Information on fiscal year enforcement activities with a comparison of fiscal year activities to those of previous years			
		Appendix A	Information on the status of each RI/FS and RA in progress at the end of the fiscal year			
		Appendix B	Information on the status of RDs in progress at the end of the fiscal year			
301(h)(1)(G)	resources, including the number of work years or personnel, which	Sections 8.1 and 8.3	EPA resource estimates for completion of CERCLA implementation			
		Section 8.4	Other federal agency's and department's estimates for completion of CERCLA implementation			
301(h)(2)	Review by the Inspector General and submission of any report related to EPA's activities for reasonableness and accuracy	Appendix E	Review of the Inspector General on this Report			
105(f)	Brief description of the contracts which have been awarded to minority firms under Superfund and the efforts made to encourage the participation of such firms in the Superfund program	Section 7.4	Information on minority contracting awards by EPA, states, Indian tribes, and other federal agencies using Superfund monies. EPA efforts to encourage increased minority contractor participation in the Superfund program			
120(e)(5)	Annual report to the Congress concerning EPA progress in implementing remedial activities at its facilities	Section 6.4	Report on EPA progress in CERCLA implementation at EPA-owned facilities, including a state-by-state status report			

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